



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

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OFFICE OF
ECOSYSTEMS, TRIBAL
AND PUBLIC AFFAIRS

March 7, 2016

Carey Case, Team Leader
USDA Forest Service
Petersburg Ranger District
P.O. Box 1328
Petersburg, Alaska 99833

Dear Team Leader Case:

Thank you for the opportunity to review the Shoreline II Outfitter and Guide Draft Environmental Impact Statement, Tongass National Forest, in southeast Alaska (EPA Project #14-0033-AFS). We have reviewed the Draft EIS in accordance with our responsibilities under Section 102(2)(C) of the National Environmental Policy Act and Section 309 of the Clean Air Act.

We understand that the Forest Service is proposing to update the 2004 Shoreline II Outfitter and Guide Record of Decision with new outfitter and guide allocations in the marine shoreline zone in the Admiralty National Monument, as well as the Hoonah, Juneau, and Sitka ranger districts, to be consistent with the 2008 Tongass Land and Resource Management Plan. These updates are intended to better reflect current market demand for non-motorized commercial recreation services.

The Draft EIS currently describes four alternatives, with the Forest Service preferred action identified as Alternative 2. We understand that with Alternative 2 the Forest Service is proposing to allocate up to 80,305 service days of the estimated total visitor capacity of 636,448 service days by season and use area to outfitter/guide use. Allocations were developed based on factors identified in the Forest Plan, such as historical outfitter/guide use, subsistence activities, proximity to communities, potential for resource impacts, and quality recreation experiences. The use may be temporary or entail multiple years, and would be permitted by special use authorizations. Priority use permits may be issued for up to 10 years to outfitters/guides who have demonstrated satisfactory performance. The other action alternatives consider lower (Alternative 3 with 63,940 service days) and higher (Alternative 4 with 130,655 service days) use allocations.

Overall, we support the Forest Service's preferred alternative, Alternative 2. We believe this alternative provides a sensible balance of the need for outfitter/guide use with resources' protections within the Monument and applicable Tongass Ranger districts. It also seems to best address the primary issues and concerns raised during scoping; namely effects to economic opportunities, effects to wilderness areas, effects of commercial uses on non-commercial visitors, and incompatible commercial uses. We also believe the Draft EIS contains a clear explanation of the purpose and need for the project, a reasonable range of alternatives, and thorough analysis of potential effects. We commend the document's authors for the use of a detailed comparison table in the summary, as well as the effects summary maps for each alternative. These resources are quite helpful to the reader.

Based on our review, we have assigned the Draft EIS a rating of LO (Lack of Objections). An explanation of our rating system is enclosed. Our only recommendation at this time is that the adaptive management strategy be more fully developed in the Final EIS. We support the current proposal to implement an adaptive management strategy involving monitoring and an environmental review process, which would be implemented when any use area's actual use fell within the range of 80 percent to 110 percent of the allocation for any use season.

Thank you again for the opportunity to review the Shoreline II Outfitter and Guide Draft Environmental Impact Statement. Please contact Jennifer Curtis of my staff in Anchorage at 907-271-6324 or curtis.jennifer@epa.gov with any questions you may have.

Sincerely,

A handwritten signature in blue ink, reading "Christine B. Littleton". The signature is fluid and cursive, with the first name "Christine" written in a larger, more prominent script than the last name "Littleton".

Christine B. Littleton, Manager
Environmental Review and Sediments Management Unit

Enclosure:

1. U.S. Environmental Protection Agency Rating System for Draft Environmental Impact Statements